

1 Karyn M. Taylor, Esq.
 2 Nevada Bar No. 6142
 3 Taylor A. Buono, Esq.
 4 Nevada Bar. No. 15513
 5 LITTLER MENDELSON, P.C.
 6 8474 Rozita Lee Avenue
 7 Suite 200
 8 Las Vegas, NV 89113-4770
 9 Telephone: 702.862.8800
 10 Fax No.: 702.862.8811
 11 kmtaylor@littler.com
 12 tbuono@littler.com

13 Attorneys for Defendant
 14 UNICITY INTERNATIONAL, INC.

15 UNITED STATES DISTRICT COURT
 16 DISTRICT OF NEVADA

17 ALEXANDER RODRIGUEZ, an individual,

18 Plaintiff,

19 v.

20 UNICITY INTERNATIONAL, INC., a Delaware
 21 Corporation,

22 Defendant.

23 Case No. 2:25-cv-00754-APG-MDC

24 **STIPULATION TO EXTEND TIME FOR
 25 DEFENDANT TO FILE RESPONSIVE
 26 PLEADING TO PLAINTIFF'S
 27 COMPLAINT**

28 **[FIRST REQUEST]**

17 Plaintiff ALEXANDER RODRIGUEZ ("Plaintiff") and Defendant UNICITY
 18 INTERNATIONAL, INC. ("Defendant"), by and through their undersigned counsel, hereby agree and
 19 stipulate to extend the time for Defendant to file a response to the Complaint from the current deadline
 20 of June 10, 2025, up to and including **June 24, 2025**.

21 The parties agree that good cause exists for this extension as counsel for Defendant was only
 22 recently retained. The additional time will allow defense counsel to conduct an investigation into the
 23 allegations and to prepare a response to the Complaint.

24 *///*

25 *///*

1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3 Dated: June 3, 2025

4 Respectfully submitted,

5 */s/ Marian L. Massey*

6 Jemma E. Dunn, Esq.
7 Matthew T. Hale, Esq.
8 Marian L. Massey, Esq.
9 GREENBERG GROSS LLP

10 *Attorneys for Plaintiff*
11 ALEXANDER RODRIGUEZ

12 Dated: June 3, 2025

13 Respectfully submitted,

14 */s/ Taylor A. Buono*

15 Karyn M. Taylor, Esq.
16 Taylor A. Buono, Eq.
17 LITTLER MENDELSON, P.C.

18 *Attorney for Defendant*
19 UNICITY INTERNATIONAL, INC.

20 **IT IS SO ORDERED.**

21 Dated: _____

22 *6-20-25*
23 *UNUNITED STATES MAGISTRATE JUDGE*